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Date: October 4, 2003

To: Commissioner for Patents  
Patent Technology Center 1700  
Fax No. (703) 872-9310

For: Jeremy R. Pierce  
Patent Examiner  
Art Unit 1771

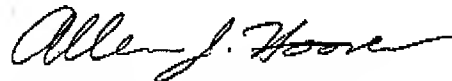
Copy: Nick M. Carter  
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From: Allen J. Hoover  
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Re: Mou-Chung Ngai, Applicant  
Application No. 09/997,673  
Docket No. PGI6044P0231US

An affidavit made by Dianne Ellis is faxed herewith, together with her *curriculum vitae*, for the examiner's consideration.



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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Applicant: Mou-Chung Ngai )  
Serial No.: 09/997,673 )  
Filing Date: November 29, 2001 )  
Docket No.: PGI6044P0231US )

Jeremy R. Pierce,  
Patent Examiner,  
Art Unit 1771

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**AFFIDAVIT**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

A copy of my *curriculum vitae* is attached, which demonstrates my expertise in the art of nonwoven fabrics. Having familiarized myself with the specification of United States Patent Application Serial No. 09/997, 673, as filed, I am addressing the following questions, which the examiner has raised:

Claim 1 recites a binder composition that enhances surface abrasiveness of a surface. How does the binder composition enhance surface abrasiveness? Is the binder composition itself formed of material that is abrasive? Does the binder composition only act to stiffen the fibers of the nonwoven surface? What type of binder is required to meet the abrasiveness requirement?

As I interpret the specification, the specification teaches that, if a binder is applied to one expansive surface of a nonwoven fabric wipe having a hydro-entangled, fibrous matrix, but not to the other expansive surface, the binder, where applied and when cured, forms surface junctions in the fibrous matrix at the expansive surface having the binder applied thereto and, consequently, enhances surface abrasiveness of the expansive surface having the binder applied thereto, as compared to surface abrasiveness of the other expansive surface, to which the binder is not applied.

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Serial No. 09/997,673

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Implicitly, if not explicitly, the specification teaches that such enhancement of surface abrasiveness results from the binder forming surface junctions in the fibrous matrix and does not depend upon the binder being abrasive, having any particular composition, or being of any particular type. I would expect persons of ordinary skill in the art of nonwoven fabrics, once taught by the specification, to be readily able to select a suitable binder, whether hard or soft, which might be a polymeric binder of any of various types used commonly in nonwoven fabrics.

Respectively submitted,

By Dianne B EllisDIANNE B. ELLIS  
[Typed or Printed Name]

State of North Carolina )

) ss

County of ~~Iredell~~ )  
~~Johnston~~Subscribed and sworn to, before me, on 9/24, 2003.Mary W. Walker  
[Notary Public]

100 Chimo Court  
Cary, NC 27513  
Phone 919-319-9079

## Dianne Ellis

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### Education

- |                   |                          |                |
|-------------------|--------------------------|----------------|
| 1979-1981         | University of Dallas     | Irving, TX     |
| • Chemistry major |                          |                |
| 1981-1984         | West Virginia University | Morgantown, WV |
| • B.S. Chemistry  |                          |                |
| 1988-2001         | Meredith College         | Raleigh, NC    |
| • M.B.A.          |                          |                |

### Professional experience

- |   |                      |             |
|---|----------------------|-------------|
| 1984-1987   | Coopervision / Cilco | Sanford, NC |
| • Research Chemist  |                      |             |
| Developed alternate method for purification of critical raw material.<br>Developed two new products for use in eye surgery.   |                      |             |
| 1987- Present   | PGI Nonwovens        | Benson, NC  |
| • Quality Assurance Supervisor  |                      |             |
| Responsible for the day to day operation of four testing labs on off shift. Coordinate work schedules. Coordinate specifications. Created system for compliance with GMPs.  |                      |             |
| • Quality Engineer  |                      |             |
| Responsible for the day to day operation of three labs. Validate all specifications. Created computerized network system for lab data. Responsible for complaint resolution. Develop and implement supplier quality system. |                      |             |
| • Senior Quality Engineer   |                      |             |
| Responsible for the day to day operation of three labs. Develop and implement system for Certificates of Analysis. Validate all specifications. Responsible for managing supplier quality system.                           |                      |             |
| • Quality Manager   |                      |             |
| Responsible for the day to day operation of three labs. Responsible for achieving ISO 9001:2000 registration. Responsible for specification and data collection systems.  |                      |             |

- **Project Coordinator**  
Responsible for coordinating the development activities between product development and plant personnel for new development for key commercial customer. Coordinate the transfer of key products between production lines and facilities. Coordinate technical aspects of product to include recipe / formulation changes. Identify, develop, and implement raw material changes to meet customer requirements.
- **Logistics Manager**  
Responsible for purchasing, warehouse, and logistics functions for plant. Manage capacity loading for facility. Responsible for improving on time shipments by 20%.
- **Senior Scientist**  
Responsible for the development of new wiping products for key customer accounts to include commercial and industrial wipes. Identify, develop, and implement various binder / chemical systems for specific end use applications. Responsible for the development of all PGI Branded Wipes including raw material selection to meet end product requirements. Responsible for transfer of existing wipes products for key customers between lines and facilities.